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*Attorneys for Defendant JPMorgan Chase Bank, N.A.,
incorrectly sued herein as Chase*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JULES NGAMBO,

Plaintiff,

vs.

CHASE,

Defendant.

Case No. 7:20-cv-02224-NSR

**NOTICE OF MOTION
TO DISMISS
SECOND AMENDED COMPLAINT**

MEMO ENDORSED

PLEASE TAKE NOTICE that upon the Declaration of Christopher B. Turcotte, Esq. dated March 17, 2023 and the exhibits annexed thereto, the accompanying Memorandum of Law, and all prior pleadings, submissions and proceedings in this action, defendant JPMorgan Chase Bank, N.A. (“Chase”), incorrectly sued herein as “Chase”, by its attorneys, will move this Court, before the Honorable Nelson S. Roman, United States District Judge, United States District Court, Southern District of New York, 300 Quarropas Street, White Plains, New York 10601, for an Order (i) granting Chase’s Motion to Dismiss Plaintiff’s Second Amended Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and (ii) granting such other and further relief which the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Special Rules of Practice in Civil *Pro Se* Cases of the Honorable Nelson S. Roman, answering papers, if any, shall be served on the undersigned, on or before April 14, 2023.

Dated: New York, New York
March 17, 2023

TURCOTTE LAW, P.C.

By: /s/Christopher B. Turcotte
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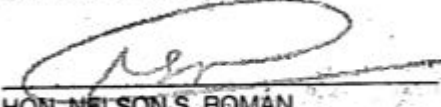
The Court DENIES WITHOUT PREJUDICE the instant motion to dismiss for failure to follow the Court's Individual Practices Rule 3.A.ii.

Defendant's moving papers will stand. The Court directs the parties to the following briefing remaining schedule on the motion to dismiss the second amended complaint: Plaintiff is directed to serve (not file) opposition papers by April 16, 2023, and Defendant is directed to serve reply papers on May 1, 2023. All parties must file their papers on ECF on the reply date, May 1, 2023. Defendant is directed to file its opening papers on the reply date.

The parties are also directed to mail two courtesy copies and one electronic copy to Chambers as the papers are served.

The Clerk of the Court is kindly directed to terminate the motion at ECF No. 29, without prejudice. The Clerk of the Court is also kindly directed to mail a copy of this endorsement to *pro se* Plaintiff at the address on the docket, and show service on the docket.

Dated: March 22, 2023
White Plains, NY

SO ORDERED:

HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE